

LO & LO LLP
JONATHAN J. LO (SBN 305306)
jonathan@lolollp.com
KELVIN J. LO (SBN 314611)
kelvin@lolollp.com
BRENDAN T. MOLLOY (346921)
brendan@lolollp.com
506 North Garfield Avenue, Suite 280
Alhambra, California 91801
Telephone: 626.289.8838
Facsimile: 626.380.3333

Attorneys for Debtor/Defendant
YAO LIN

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SAN FERNANDO VALLEY DIVISION

In re

Case No. 1:23-bk-10733-MB

YAO LIN.

Adv. No. 1:23-ap-01036-MB

Chapter 7

Hon. Martin R. Barash

BEIJING SOUFUN SCIENCE AND
TECHNOLOGY DEVELOPMENT CO., LTD.

**DEFENDANT YAO LIN'S INDEX OF
EXHIBITS IN SUPPORT OF MOTION
FOR SUMMARY JUDGMENT OR, IN
THE ALTERNATIVE, FOR SUMMARY
ADJUDICATION**

Plaintiff.

Date:

Time:

Place: 21041 Burbank Blvd., Crtrm 303
Woodland Hills, CA 91367

Judge: Hon. Martin R. Barash

YAO LIN.

Defendant

**TO THE HONORABLE MARTIN R. BARASH, UNITED STATES BANKRUPTCY
JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, THE PLAINTIFF, AND
PARTIES IN INTEREST:**



1 In compliance with this Court's Local Bankruptcy Rule 7056-1(b)(2), Defendant YAO
2 LIN ("YAO LIN" or "Defendant"), by hereby submits the Index of Exhibits ("Index"), including
3 (i) a summary of each exhibit; (ii) its authentication; (iii) its basis for its admission is attached to
4 this pleading and is incorporated herein by reference. The Index additionally identifies those
5 exhibits for which Defendant requests judicial notice be taken. Pursuant to Fed.R.Evid. 201,
6 Defendant respectfully requests judicial notice be taken. This Index is made in support of
7 Defendant's motion for summary judgment on the adversary complaint ("Complaint") filed by
8 plaintiffs BEIJING SOUFUN SCIENCE AND TECHNOLOGY DEVELOPMENT CO., LTD.
9 ("Plaintiff").

10 **INDEX OF EXHIBITS IN SUPPORT OF MOTION FOR SUMMARY JUDMGENT [LBR]**

11 **7056-1(b)(2)]**

12 **SUMMARY JUDGMENT**

No.	Description	Declarant	Authentication	Admissibility
No. 1	March 17, 2014 Memorandum of Agreement regarding the first separation of Jia Chen and Yao Lin.	Yao Lin and Jia Chen	Witness Testimony (FRE 901(b)(1))	Personal Knowledge (FRE 901(b)(1))
No. 2	Declaration of Yao Lin	Yao Lin	Witness Testimony (FRE 901(b)(1))	Personal Knowledge (FRE 901(b)(1))
No. 3	Declaration of Jia Chen	Jia Chen	Witness Testimony (FRE 901(b)(1))	Personal Knowledge (FRE 901(b)(1))
No. 4	Email communication between Jia Chen and her Friend Amy Lee dated March 18, 2014 regarding Yao Lin's Cheating	Jia Chen	Witness Testimony (FRE 901(b)(1))	Personal Knowledge (FRE 901(b)(1))
No. 5	Grant Deed relating to the purchase of the 27487 Latigo Bay View Drive, Malibu CA 90265 Property (the "Latigo	Yao Lin and Jia Chen	Witness Testimony (FRE 901(b)(1))	Records of Documents Affecting an Interest in Property (FRE



1	Bay Property") dated May 15, 2015			803(14)
2				
3	No. 6 Email communication between Jia Chen and her friend Amy Lee dated August 5, 2014 speaking about Yao Lin's reuniting with Jia Chen.	Yao Lin	Witness Testimony (FRE 901(b)(1))	Personal Knowledge (FRE 901(b)(1))
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5	No. 7 Yao Lin's Memorandum of Points and Authorities in support of opposition to petition for confirmation recognition and enforcement of foreign arbitration award	N/A	Certified Public Records (FRE 902(4)); Request for Judicial Notice (FRE 201)	Party Admission (FRE 801(d)(2)(A), (B))
6				
7	No. 8 Grant deed relating to the purchase of the 31663 Broad Beach Road, Malibu, CA 90265 property (the "Broad Beach Property")	Yao Lin and Jia Chen	Witness Testimony (FRE 901(b)(1))	Records of Documents Affecting an Interest in Property (FRE 803(14))
8				
9	No. 9 Record of Yao Lin's Wechat payment transfers to his mistress discovered by Jia Chen and dated January 30, 2018.	Jia Chen	Witness Testimony (FRE 901(b)(1))	Personal Knowledge (FRE 901(b)(1))
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11	No. 10 January 31, 2018 Memorandum of Agreement regarding the second separation of Jia Chen and Yao Lin.	Yao Lin and Jia Chen	Witness Testimony (FRE 901(b)(1))	Personal Knowledge (FRE 901(b)(1))
12				
13	No. 11 Denial of Coverage Letter from Farmers Insurance Regarding the Latigo Bay Property	Jia Chen	Witness Testimony (FRE 901(b)(1))	Personal Knowledge (FRE 901(b)(1))
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15	No. 12 Jia Chen emails with the Malibu emergency relief fund dated December 8 to 31, 2018	Jia Chen	Witness Testimony (FRE 901(b)(1))	Personal Knowledge (FRE 901(b)(1))
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1	No. 13	Jia Chen Letter to FEMA dated November 24, 2018	Jia Chen	Witness Testimony (FRE 901(b)(1))	Personal Knowledge (FRE 901(b)(1))
2	No. 14	Grant Deed transferring the Latigo Bay Property to Jia Chen as her sole and separate property dated January 7, 2019	Yao Lin and Jia Chen	Witness Testimony (FRE 901(b)(1))	Records of Documents Affecting an Interest in Property (FRE 803(14))
3	No. 15	Grand Deed transferring the Broad Beach Property to Jia Chen as her sole and separate property dated January 7, 2019	Yao Lin and Jia Chen	Witness Testimony (FRE 901(b)(1))	Records of Documents Affecting an Interest in Property (FRE 803(14))
4	No. 16	Notarization of Grant Deed transferring the Latigo Bay Property to Jia Chen as her sole and separate property dated March 11, 2019	Jia Chen	Witness Testimony (FRE 901(b)(1))	Records of Documents Affecting an Interest in Property (FRE 803(14))
5	No. 17	Notarization of Grant Deed transferring the Broad Beach Property to Jia Chen as her sole and separate property dated March 11, 2019	Jia Chen	Witness Testimony (FRE 901(b)(1))	Records of Documents Affecting an Interest in Property (FRE 803(14))
6	No. 18	Memorandum of Understanding between Wirecard and Allscore whereby Wirecard offers to purchase Allscore.	Yao Lin	Witness Testimony (FRE 901(b)(1))	Personal Knowledge (FRE 901(b)(1))
7	No. 19	WeChat Transfer Records between Yao Lin and his Mistress discovered by Jia Chen as evidence of continuing affair	Jia Chen	Witness Testimony (FRE 901(b)(1))	Personal Knowledge (FRE 901(b)(1))
8	No. 20	Wechat Chat history between Jia Chen and her lawyer Mr. Sun regarding	Jia Chen	Witness Testimony (FRE 901(b)(1))	Personal Knowledge (FRE 901(b)(1))



1	proceeding with a divorce after discovering the affair had continued. Chats are dated from September 5 2019 to September 10, 2019.			
5	No. 21 Divorce Agreement between Yao Lin and Jia Chen dated September 12, 2019	Yao Lin and Jia Chen	Witness Testimony (FRE 901(b)(1))	Personal Knowledge (FRE 901(b)(1))
9	No. 22 Divorce Certificate for Yao Lin and Jia Chen registered in China and dated September 12, 2019	Yao Lin and Jia Chen	Witness Testimony (FRE 901(b)(1)) Foreign Public Documents (FRE902(3))	Personal Knowledge (FRE 901(b)(1))
13	No. 23 Agreement dated November 5, 2019 for Wirecard to purchase Joydragon and Aiwu the holding companies for Allscore for a total of €78,695,023.	Yao Lin	Witness Testimony (FRE 901(b)(1))	Personal Knowledge (FRE 901(b)(1))
17	No. 24 Registration for Joy Dragon Consultants Limited	Yao Lin	Witness Testimony (FRE 901(b)(1)) Foreign Public Documents (FRE902(3))	Personal Knowledge (FRE 901(b)(1))
21	No. 25 News Article regarding Wirecard's agreement to purchase Allscore.	Yao Lin	Request for Judicial Notice (FRE 201)	Fed. R. Evid. 201(b), (c):(b) Kinds of Facts That May Be Judically Noticed. The court may judicially notice a fact that is not subject to reasonable dispute because it:(1) is generally known within the trial court's territorial jurisdiction; or (2) can be accurately

				and readily determined from sources whose accuracy cannot reasonably be questioned.(c) Taking Notice. The court:(1) may take judicial notice on its own; or (2) must take judicial notice if a party requests it and the court is supplied with the necessary information.
No. 26	Prenuptial Agreement between Yao Lin and Jia Chen signed on December 24, 2019 before the parties remarried.	Yao Lin and Jia Chen	Witness Testimony (FRE 901(b)(1))	Personal Knowledge (FRE 901(b)(1))
No. 27	Marriage Certificate dated December 30, 2019 relating to when Jia Chen and Yao Lin remarried.	Yao Lin and Jia Chen	Witness Testimony (FRE 901(b)(1)) Foreign Public Documents (FRE902(3))	Personal Knowledge (FRE 901(b)(1))
No. 28	Financial Times Limited news article regarding the collapse of Wirecard into insolvency and dated June 25, 2020	Yao Lin	Request for Judicial Notice (FRE 201)	Fed. R. Evid. 201(b), (c):(b) Kinds of Facts That May Be Judiciously Noticed. The court may judiciously notice a fact that is not subject to reasonable dispute because it:(1) is generally known within the trial court's territorial jurisdiction; or (2) can be accurately and readily determined from sources whose

1	2	3	4	accuracy cannot reasonably be questioned.(c) Taking Notice. The court:(1) may take judicial notice on its own; or (2) must take judicial notice if a party requests it and the court is supplied with the necessary information.
9	No. 29	Email communications between Yao Lin and Wirecard regarding the merger and acquisition of Allscore	Yao Lin	Witness Testimony (FRE 901(b)(1)) Personal Knowledge (FRE 901(b)(1))
12	No. 30	Escrow documents regarding Jia Chen's taking of the Broad Beach Property mortgage into her sole name dated March 23, 2021	Jia Chen	Witness Testimony (FRE 901(b)(1)) Personal Knowledge (FRE 901(b)(1))
15	No. 31	Plaintiff BSF's Adversary complaint	N/A	Certified Public Records (FRE 902(4)); Request for Judicial Notice (FRE 201) Party Admission (FRE 801(d)(2)(A), (B)) Fed. R. Evid. 201(b), (c):(b) Kinds of Facts That May Be Judicially Noticed. The court may judicially notice a fact that is not subject to reasonable dispute because it:(1) is generally known within the trial court's territorial jurisdiction; or (2) can be accurately and readily determined from sources whose

1	accuracy cannot
2	reasonably be
3	questioned.(c)
4	Taking Notice. The
5	court:(1) may take
6	judicial notice on its
7	own; or (2) must
8	take judicial notice if
	a party requests it
	and the court is
	supplied with the
	necessary
	information.

9
10 Dated: May 15, 2025

LO & LO LLP

11 By: _____
12

13 Jonathan J. Lo
14 Kelvin J. Lo
15 Brendan T. Molloy
16 Attorneys for Debtor/Defendant
17 YAO LIN